

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	PS Docket No. 12-94
Transition Process for 700 MHz Public)	PS Docket No. 06-229
Safety Broadband Waiver Recipients)	

To: Chief, Public Safety and Homeland Security Bureau

Comments of The Iowa Statewide Interoperable Communications System Board (ISICSB)

The Iowa Statewide Interoperable Communications System Board (ISICSB) was granted a waiver on May 12, 2010 by the Commission as one of the 21 jurisdictions so authorized for early deployment of a 700 MHz public safety broadband network. The ISICSB hereby files these comments in response to the Public Safety and Homeland Security Bureau's (the "Bureau") Request for Comment on the transition process for 700 MHz public safety broadband waiver recipients.¹

The Commission Should Extend the Existing Leases to Waiver Recipients as Part of the Transition of the Spectrum to FirstNet.

The ISICSB is a member of the Operators Advisory Committee to the Public Safety Spectrum Trust (OAC), and fully supports and endorses the comments filed separately by the OAC in this matter requesting extension of the existing leases to waiver recipients as part of the transition of the spectrum to FirstNet. Those comments are hereby adopted by reference herein and will not be listed in detail again in this filing.

¹ Public Notice, "Public Safety and Homeland Security Bureau Seeks Comment on transition Process for 700 MHz Public Safety Broadband Waiver Recipients," DA 12-555 (rel. April 6, 2012).

The ISICSB files these separate comments to present information to the Commission of particular importance and significance to the ISICSB and State of Iowa.

The ISICSB has made extensive progress in planning, consulting with vendors, and working with the concerned federal partners and with the other waiver recipients and the OAC to exchange information and learn from each other's efforts. The ISICSB applied for, but did not receive BTOP funding, thus hampering its ability to progress further in its build-out of a public safety broadband network.

The ISICSB has a very strong interest in the Bureau's Request for Comment and in the outcome of this proceeding. The ISICSB respectfully submits that in transitioning Call Sign WQHW226 to FirstNet, the FCC should continue the Waivers and extend the 21 leases (currently set to expire on September 2, 2012) for the ISICSB and the other recipients for an additional two-year period, to allow the ISICSB to continue its efforts.

The next year or two will be a critical period for FirstNet and the eventual development of a Nationwide Public Safety Broadband Network (NPSBN). Two components will be especially critical: 1) Technical specifications and national architecture as developed by FirstNet, and 2) public and state acceptance of that NPSBN.

Using its waiver and leased license, the ISICSB is planning to initiate a broadband 'Demonstration Project' in which it would operate a public safety broadband network as a demonstration and on a temporary basis on one or more occasions in a limited geographical area to demonstrate the technology and educate our Governor's Office, elected officials, and public safety officials in order to sufficiently prepare and educate them for the decisions to be required by the State of Iowa from FirstNet. We believe other waiver recipients may decide to do the same. We believe that without this critical planning step, the NPSBN and the 'Opt-in/Opt-out'

decision making process, and the resulting NPSBN, will be negatively affected. The ISICSB does not propose a vendor specific demonstration, but an LTE public safety technology demonstration. Any decisions regarding the equipment to be used or specifics for this demonstration will comply with Iowa statutes and regulations.

On the other hand, if the Waiver and Lease is not extended, this planning and education will be halted, which the ISICSB believes is not the intent of the legislation. We believe it is the intent of the legislation to take full advantage of all efforts by the waiver recipients and the FCC to date. We request that the FCC transition the existing leases to FirstNet with all conditions and authority in-tact and pending until the stand-up of FirstNet is completed and it is in a position to fully evaluate this issue and rule on the waivers and leases, which may take some time. This prevents lost time, yields a more educated public safety and elected official community in Iowa, and provides First Net with additional knowledge and experience to make informed decisions. We believe this proposal is in the best interest of all and is within the authority of the FCC.

Respectfully submitted,

The Iowa Statewide Interoperable Communications System Board

By: _____

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